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12 United States of America  
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15 IN THE UNITED STATES DISTRICT COURT  
16  
17 EASTERN DISTRICT OF CALIFORNIA

18  
19 UNITED STATES OF AMERICA,

CASE NO. 2:23-CR-00320-KJM

20 Plaintiff,

21  
22 STIPULATION REGARDING EXCLUDABLE  
23 TIME PERIODS UNDER SPEEDY TRIAL ACT;  
24 FINDINGS AND ORDER

v.

25  
26 SHAHRIAR "SEAN" LOLOEE,  
27 KARLA MONTOYA,  
28 MIRWAIS SHAMS, and  
AHMAD "SHAH" SHAMS,

29  
30 Defendants.

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33 STIPULATION

34 1. By previous order, this matter was set for status on May 27, 2025. Mins., ECF No. 148.

35 Also by previous order, time under the Speedy Trial Act was excluded through May 13, 2025. Order,  
36 ECF No. 144.

37 2. By this stipulation, the parties now request that the Court enter an order excluding time  
38 under the Speedy Trial Act between May 13, 2025, and May 27, 2025, under Local Code T4.

39 3. The parties agree and stipulate, and request that the Court find the following:

40 a) The discovery in this case consists of at least ten terabytes of data that was  
41 previously produced to defense counsel on multiple hard drives. The discovery in this case also  
42 includes dozens of boxes of physical employment records, which must be reviewed in person.

1 All of this discovery has been either produced directly to defense counsel and/or made available  
2 for inspection and copying. To date, defense counsel has reviewed hundreds of thousands of  
3 pages of discovery and continues to do so.

4 b) Between May 13 and May 27, counsel for all defendants will continue reviewing  
5 produced discovery, conducting investigation and research relevant to the charges facing their  
6 clients, and otherwise preparing for trial. Counsel for all defendants anticipate informing the  
7 Court of an updated estimate for when this process will be complete at the upcoming status  
8 conference.

9 c) Counsel for the defendants believe that failure to grant the above-requested  
10 exclusion would deny them reasonable time necessary for effective preparation, taking into  
11 account the exercise of due diligence.

12 d) The government does not object to the requested exclusion of time.

13 e) Based on the above-stated findings, the ends of justice served by excluding time  
14 as requested outweigh the interest of the public and the defendants in a trial within the original  
15 date prescribed by the Speedy Trial Act.

16 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
17 et seq., within which trial must commence, the time period of May 13, 2025, to May 27, 2025,  
18 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]  
19 because it results from an exclusion granted by the Court at the defendants' request on the basis  
20 of the Court's finding that the ends of justice served by taking such action outweigh the best  
21 interest of the public and the defendants in a speedy trial.

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1       4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
2 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
3 must commence.

4       IT IS SO STIPULATED.

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6       Dated: May 8, 2025

MICHELE BECKWITH  
Acting United States Attorney

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8       \_\_\_\_\_  
9       /s/ SAM STEFANKI  
10      AUDREY HEMESATH  
11      MATTHEW THUESEN  
12      SAM STEFANKI  
13      Assistant United States Attorneys

14  
15      Dated: May 8, 2025

16       \_\_\_\_\_  
17       /s/ SHERRY D.H. HAUS  
18      SHERRY D.H. HAUS  
19      Counsel for Defendant SHAHRIAR LOLOEE

20  
21      Dated: May 8, 2025

22       \_\_\_\_\_  
23       /s/ KEVIN JAMES ROONEY  
24      KEVIN JAMES ROONEY  
25      Counsel for Defendant SHAHRIAR LOLOEE

26  
27      Dated: May 8, 2025

28       \_\_\_\_\_  
29       /s/ THOMAS A. JOHNSON  
30      THOMAS A. JOHNSON  
31      Counsel for Defendant SHAHRIAR LOLOEE

32  
33      Dated: May 8, 2025

34       \_\_\_\_\_  
35       /s/ WILLIAM J. PORTANOVA  
36      WILLIAM J. PORTANOVA  
37      Counsel for Defendant KARLA MONTOYA

38  
39      Dated: May 8, 2025

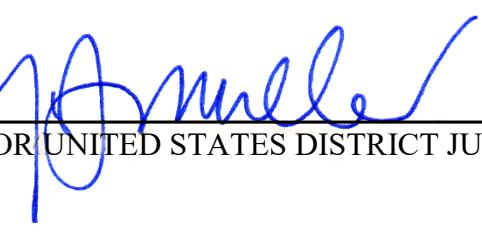
40       \_\_\_\_\_  
41       /s/ MICHAEL D. LONG  
42      MICHAEL D. LONG  
43      Counsel for Defendant MIRWAIS SHAMS

44  
45      Dated: May 8, 2025

46       \_\_\_\_\_  
47       /s/ TIMOTHY E. WARRINER  
48      TIMOTHY E. WARRINER  
49      Counsel for Defendant AHMAD SHAMS

24       **ORDER**

25       IT IS SO FOUND AND ORDERED this 29th day of May, 2025 (nunc pro tunc to May 8, 2025).

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30      SENIOR UNITED STATES DISTRICT JUDGE